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2 BRENT L. RYMAN, ESQ. (#008648)
3 CHARITY F. FELTS, ESQ. (#010581)
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5 99 West Arroyo Street
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Attorneys for Mineral County Defendants

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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF NEVADA

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14 BOBBY D. SANCHEZ, VINTON
HAWLEY, JOHNNY WILLIAMS, JR.,
ROBERT JAMES, AND RALPH
BURNS,

15 Plaintiffs,
16
17 v.

18 BARBARA K. CEGAVSKE, IN HER
19 OFFICIAL CAPACITY AS
SECRETARY OF STATE FOR THE
20 STATE OF NEVADA, *et al.*,

21 Defendants.
22 _____ /

Case No.: 3:16-cv-00523-MMD-VPC

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
TO RESPOND TO MOTION FOR
ATTORNEYS' FEES (#61)**

23 COMES NOW, Defendants, COUNTY OF MINERAL, a political subdivision of the
24 State of Nevada, along with its Board of Commissioners, NANCY BLACK, PAUL
25 MacBETH and JERRY TIPTON, and its Clerk-Treasurer CHRISTOPER NEPPER, in their
26 official capacities (hereinafter the "Mineral County Defendants"), by and through their
27 Attorneys of Record, ERICKSON, THORPE & SWAINSTON, LTD., BRENT L.
28 RYMAN, ESQ., and CHARITY F. FELTS, ESQ., and Plaintiffs, by and through their

1 Attorneys of Record, MILLER LAW, INC., and RENDAL B. MILLER, ESQ., and hereby
2 stipulate to an extension up to and including November 23, 2016, in which for the Mineral
3 County Defendants to respond to Plaintiffs' Motion for Attorneys' Fees and Costs (#61).

4 No previous extensions have been requested from or granted by this Court regarding
5 the response to this Motion; however, the parties have requested and received an extension
6 of time for these Defendants to answer or otherwise appear in response to Plaintiffs'
7 Complaint of the same date. The State and Washoe County Defendants have already
8 requested and received the same extension requested in this stipulation. The signing parties
9 certify this stipulation has been reached in good faith, for the purposes of assessing the course
10 of the actions ordered by this Court in the form of a preliminary injunction and engaging in
11 informed settlement discussions thereon, as well as saving the potentially-unnecessary time
12 and expense of preparing a response to Plaintiffs' Motion for Attorneys' Fees, and is not
13 meant for the purposes of undue delay.

14 DATED this 31st day of October, 2016.

15 MILLER LAW, INC.
16
17 /s/ Rendal Miller
18 RENDAL B. MILLER, ESQ. (#012257)
19 115 West Fifth Street, Box 7
20 Winnemucca, Nevada 89445
21 Telephone (775) 623-5000
22 *Attorneys for Plaintiffs*
23
24 ///
25 ///
26 ///
27 ///
28 ///

1 DATED this 31st day of October, 2016.

2 ERICKSON, THORPE & SWAINSTON, LTD.

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4

/s/ Brent Ryman

5 BRENT L. RYMAN, ESQ. (#008648)
CHARITY F. FELTS, ESQ. (#010581)
6 ERICKSON, THORPE & SWAINSTON, LTD.
99 West Arroyo Street
P.O. Box 3559
7 Reno, Nevada 89505
Telephone: (775) 786-3930
8 *Attorneys for the Mineral County Defendants*

9 ///

10 ///

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ORDER

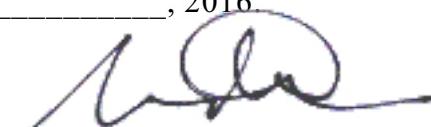
12 IT IS HEREBY ORDERED that the Mineral County Defendants shall have an
13 extension of time until November 23, 2016, within which to respond to Plaintiff's Motion for
14 Attorneys' Fees and Costs (#61).

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DATED this 31st day of October, 2016.

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UNITED STATES DISTRICT COURT

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1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP Rule 5, I certify that I am an employee of ERICKSON, THORPE &
3 SWAINSTON, LTD. and that on this day I caused to be served a true and correct copy of the
4 attached document by:

- 5 U.S. Mail
6 Facsimile Transmission
7 Personal Service
8 Messenger Service
X CMECF

9 addressed to the following:

10 Rendal B. Miller, Esq.
Miller Law, Inc.
11 115 West Fifth Street, Box 7
Winnemucca, Nevada 89445
12 *Attorneys for Plaintiffs*

13 Adam Paul Laxalt, Esq.
Attorney General
14 Lori M. Story, Esq.
Senior Deputy Attorney General
15 100 North Carson Street
Carson City, Nevada 89701
16 *Attorneys for Defendant, Secretary of State*

17 Christopher J. Hicks, Esq.
Washoe County District Attorney
18 Michael W. Large, Esq.
Washoe County Deputy District Attorney
19 P.O. Box 11130
Reno, Nevada 89520
20 *Attorneys for Washoe County Defendants*

21 DATED this 31st day of October, 2016.

22 _____
23 /s/ Brent Ryman
Brent Ryman